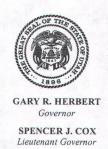
OIL, GAS & MINING



State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

March 17, 2016

Erez Goldgraber
Bromide Mining, LLC.
80 Southwest 8th Street, Suite 2000
Miami, Florida 33130

Subject: Deficient Notice of Intention to Commence Small Mining Operations, Bromide Mining LLC.,

Bromide Basin Mine, S/017/0031, Garfield County, Utah

Dear Mr. Goldgraber:

The Division of Oil, Gas and Mining has reviewed the referenced Notice of Intention to Commence Small Mining Operations (NOI) received on February 26, 2016, and the following items will need to be addressed before the NOI can be determined complete:

- 1. Section I-2: The mailing address should be the corporate address: 80 SW 8th Street, Suite 2000, Miami, Florida 33130. The Hanksville address should also be listed under the contact person(s).
- 2. Section I-2: The email address should also include corporate officers.
- Please complete Section I-3 with the registered Utah agent. According to the Utah
 Division of Corporations, the registered agent is Incorp Services, Inc., 1226 West South
 Jordan Parkway, Suite B, South Jordan, Utah 84095-5966.
- 4. Please list Erick Gadea as an officer of Bromide Mining LLC.
- 5. In Section I-6, please show the mineral ownership. Note that the mineral owner may be different than the surface owner.
- 6. What is ML-52266 Utah State Lease Number(s)? In Section III 6, ML-52266 is listed as a Utah State Lease Number, but to the Division's knowledge there are no State Trust Lands in the area.
- 7. Section III-6. Please provide additional information about the new road. It is shown as being 4,600 feet long and 20 feet wide for a total disturbance of 2.11 acres. The additional area is not listed in the disturbed area acreage.
- 8. Section III-8: The disturbed area is listed as 16.33 acres. The maximum disturbed area for a small mine is 10.0 acres. You must submit a bond release form for the disturbed areas that have been reclaimed, or you need to submit a Notice of Intention to Commence Large Mining Operations.
- 9. Section VIII must be signed by an officer of the company.
- 10. Form MR-REV-SMO must be signed by an officer of the company.
- 11. Map 6. While satellite images (which were not included) may show that the small triangle piece of ground was disturbed as early as 1968, Bromide Mining is still responsible for reclamation of this area because it has been used for mining operations since the

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- implementation of the Utah Mined Land Reclamation Act. The land must be either reclaimed or listed as part of the disturbed area.
- 12. On Map 6 there is an area of 1.61 acres that is listed as "Previously Disturbed Non Resposable [sic]." The area north of the road is not shown as disturbed or rehabilitated. However Google Earth images show that the area was used for mining operations as last as 2013. That area must be included in the disturbed area boundaries.
- 13. The area by the El Padre Adit must be included in the disturbed area. This area is approximately 0.28 acres.
- 14. To calculate the reclamation cost estimate, the Division needs a list of all structures and facilities in the disturbed area. This includes, but is not limited to, the cabin by the El Padre Adit; the office building, connex containers, crusher, compressor, ball mill, septic tank, and generator at the Har-El Mill; and the shop/warehouse at the western area of the disturbed area boundary (where the oil spill occurred).
- 15. Please include a list of all underground openings, including all adits, shafts and unplugged drill holes.
- 16. Please list the areas and structures that are on BLM-managed land and those on private or patented land. The reclamation cost estimate needs to break out the cost for reclaiming disturbances on BLM lands.

Please provide your response as replacement pages to the original NOI, using Form MR-REV-SMO/EXP, available on the Division's web site at www.ogm.utah.gov.

Please call Wayne Western at 801-538-5263 if you have questions concerning this letter. In reply, <u>please refer to file number S/017/0031</u>. Thank you for your cooperation.

Sincerely,

Paul B. Baker

Minerals Program Manager

PBB: whw: eb

cc: John Reay, Hanksville BLM (jreay@blm.gov)
Shane Scott, 100 Ease 20 North, Hanksville, UT 84734